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Attorneys for Plaintiff

Attorneys for Plaintiff
POWER BUSINESS TECHNOLOGY, LLC

UNITED STATES DISTRICT COURT

POWER BUSINESS TECHNOLOGY, LLC,

Plaintiff,

V.

WiZiX TECHNOLOGY GROUP, INC.;
GARY JOHNSON; TYLER JOHNSON;
BRAD FARNUM; JOSEPH POWER; and
DOE Defendants 1 through 20, inclusive,

Defendants.

Case No. 2:23-cv-00518-AC

**JOINT REPORT AND
STIPULATION REGARDING
PROPOSED CHANGES TO
INITIAL SCHEDULING ORDER
[ECF NOS. 35 & 43]; AND
[PROPOSED] ORDER**

1 Pursuant to the Court's August 22, 2024 Minute Order (ECF No. 43), Plaintiff Power
 2 Business Technology, LLC ("Plaintiff" or "PBT") and Defendants, WiZiX Technology Group,
 3 Inc., Gary Johnson, Tyler Johnson, Brad Farnum and Joseph Power ("Defendants") (collectively,
 4 the "Parties"), through undersigned counsel, met and conferred on the existing scheduling order.
 5 The Parties agree that, despite diligent efforts to advance the case to date, at least an additional
 6 six months is necessary to prepare their respective cases for trial. Accordingly, the Parties hereby
 7 stipulate and submit the following proposed changes to certain deadlines in the previously issued
 8 scheduling order (ECF No. 35).

| Deadline | Current Deadline | Proposed Deadline |
|---|----------------------------------|-----------------------------------|
| Fact Discovery Shall Be Completed | January 3, 2025 | July 7, 2025 |
| Disclosure of Initial Experts and Production of Reports | January 17, 2025 | July 18, 2025 |
| Disclosure of Rebuttal Experts and Production of Reports | February 18, 2025 | August 19, 2025 |
| Expert Discovery Shall be Completed | March 18, 2025 | September 16, 2025 |
| Deadline to file all motions, except motions for continuances, temporary restraining orders, or other emergency applications | May 2, 2025 | October 31, 2025 |
| Final Pretrial Conference | August 26, 2025 at 1:30 p.m. | February 24, 2026 at 1:30 p.m. |
| Jury Trial | October 27, 2025 at 9:00 a.m. | April 27, 2026 at 9:00 a.m. |

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4 DATED: September 17, 2024

STOEL RIVES LLP

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10 DATED: September 5, 2024

BOUTIN JONES INC.

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By: /s/ Corey M. Day
THOMAS A. WOODS
COREY M. DAY
Attorneys for Plaintiff
POWER BUSINESS
TECHNOLOGY, LLC

BOUTIN JONES INC.

By: /s/ Ian K. McGlone
DANIEL S. STOUDER
IAN K. MCGLONE

Attorneys for Defendants WiZiX
TECHNOLOGY GROUP, INC., GARY
JOHNSON, TYLER JOHNSON, BRAD
FARNUM and JOSEPH POWER

SIGNATURE CERTIFICATION

Pursuant to Civil Local Rule 5-4.3.4, I attest that the signatory above concurs with the contents of this, Report, Stipulation, and Proposed Order (“Report”), and authorized the filing of this Report.

DATED: September 17, 2024

STOEL RIVES LLP

By: /s/ Corey M. Day
THOMAS A. WOODS
COREY M. DAY
Attorneys for Plaintiff
POWER BUSINESS
TECHNOLOGY, LLC

1 [PROPOSED] ORDER
23 Before the Court is the Parties' joint report and stipulation regarding proposed changes to
4 the current scheduling order. After review of same the Court revises the previously issued
5 scheduling order (ECF No. 35) as follows:

| 6 Deadline | 7 Current Deadline | 8 New Deadline |
|---|---------------------------|--|
| 9 Fact Discovery Shall Be Completed | 10 January 3, 2025 | 11 July 7, 2025 12 [OR] 13 [REDACTED] |
| 14 Disclosure of Initial Experts and 15 Production of Reports | 16 January 17, 2025 | 17 July 18, 2025 18 [OR] 19 [REDACTED] |
| 20 Disclosure of Rebuttal Experts and 21 Production of Reports | 22 February 18, 2025 | 23 August 19, 2025 24 [OR] 25 [REDACTED] |
| 26 Expert Discovery Shall be Completed | 27 March 18, 2025 | 28 September 16, 2025 [OR] [REDACTED] |
| Deadline to file all motions, except motions for continuances, temporary restraining orders, or other emergency applications | May 2, 2025 | October 31, 2025 [OR] [REDACTED] |

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|--|---------------------------|----------------------------------|--|
| 1 2 3 4 5 6 7 8 9 10 11 12 13 | Final Pretrial Conference | August 26, 2025 at 1:30 p.m. | February 24, 2026 at 1:30 p.m.] [OR] February 25, 2026 at 10:00 a.m. |
| 14 15 16 17 18 19 20 21 22 23 24 25 26 27 28 | Jury Trial | October 27, 2025 at 9:00 a.m. | April 27, 2026 at 9:00 a.m.] [OR] April 27, 2026 at 9:00 a.m. |

IT IS SO ORDERED.

DATED: September 17, 2024


ALLISON CLAIRE
UNITED STATES MAGISTRATE JUDGE